

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

SADEK LAW OFFICES
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Attorney(s) for Debtor

In re: : IN BANKRUPTCY
Tracey Campbell : CHAPTER 13
Debtor(s) :
: CASE NO. 24-22523 (JNP)
: HEARING: January 14, 2025 @ 11:00 am
: ORAL ARGUMENT WAIVED

**APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR NOTICE
UNDER FED.R.BANKR.P. 9006 (c) (1)**

The application of Jeanie D. Wiesner, Esq. respectfully represents:

1. I am the Attorney for the Debtor in this case.
2. I am contemporaneously filing herewith a Motion to Extend the Automatic Stay for the above captioned debtor. A shortened hearing time on this matter is requested as the Debtor has the primary purpose of the filing is to resolve mortgage arrears and prevent potential Foreclosure action and Sheriff's Sale. If the Stay were not to be Extended, the lender may take action to pursue Foreclosure.
3. The Debtor filed a Pro Se individual Chapter 13 Bankruptcy on or about September 20, 2024. The original schedules and Plan were deficient significant information and, shortly after filing, the Debtor had a medical emergency requiring surgery with little to no notice. She lost both time at work and income and was unable to effectively respond to the Trustee's requests or make the necessary revisions to her Schedules and Plan. Prior to dismissal, the

Debtor had retained our office to represent her, but was unable to resume monthly Trustee payments before the Trustee's Motion to Dismiss was granted. Since the date of dismissal, the Debtor has provided our office with all required documents, assisted in preparation of a complete and clear Petition, Schedules and Plan and has returned to work full time. Further, the Debtor has made significant adjustments to her budget. The Debtor is now able to propose and complete a feasible Chapter 13 Plan.

4. In order to prevent a potential Foreclosure and other collection activities from creditors – including but not limited to bank levy and wage garnishment - it is imperative that this matter be heard on shortened time to ensure that the Motion Extending of the Automatic Stay be heard and Order granting Motion be timely entered before the thirtieth (30th) day from the date of the filing of the Debtor's current Chapter 13 Bankruptcy.

5. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006 (c)(1) and the Rules listed therein.

WHEREFORE Debtors request the entry of the order submitted herewith.

Dated: December 23, 2024

/s/ Jeanie D. Wiesner
Jeanie D. Wiesner, Esq.